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December 5, 2019

**VIA ECF**

Hon. Andrew L. Carter, Jr.  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *United States v. Malhotra, et al.*, 19 Cr. 411 (ALC)**

Dear Judge Carter:

Cesar de Castro and I represent Jas Pal in the above-referenced matter. We write, with the consent of the government and Pretrial Services, to request that the court modify Mr. Pal's bail conditions.

Mr. Pal is currently on bail subject to supervision by Pretrial Services and he is to have no computer or internet access, including no smartphone or computer use. His travel is restricted to the Southern and Eastern Districts of New York. Mr. Pal is a taxi cab driver. He works in New York, New Jersey and Connecticut. He needs internet access to allow him to check his bank accounts daily to ensure that his daily earnings have been deposited appropriately. Without internet access, he must rely on paper statements which he can only access once a month, which delays the processing of his payments when there are discrepancies. We request that Mr. Pal's bail conditions be modified to include the following:

1. Travel restricted to New York, New Jersey and Connecticut for work purposes only, and
2. No soliciting or providing computer repair or IT services to others, or soliciting payment for those services.

Further, we request that the Court remove the condition mandating no computer access, as he must use a global positioning system ("GPS") such as a Garmin system for work purposes.

Thank you for your consideration.

Jennifer R. Lewis June

cc: AUSA Ryan Finkel  
Pretrial Services Officer Francesca Tessier-Miller

☐ granted.  
☐ denied.  
 Andrew L. Carter Jr, U.S.D.J.  
 Dated: 12-30-19  
 NY, New York